

December 29, 2022

VIA ECF

Hon. Lorna G. Schofield
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Robert Ryuichi Mitsugi v. Eunji Jung, No. 1:22-cv-08025 (LGS)*

Dear Judge Schofield:

Pursuant to the Court’s Civil Case Management Plan and Scheduling Order dated December 1, 2022 (ECF No. 21, Dec. 1, 2022), Robert Ryuichi Mitsugi (“Petitioner”) and Eunji Jung (“Respondent”), proceeding pro se, (together, “Parties”), jointly submit this joint status letter.

(a) What discovery has taken place, specifically (1) What discovery requests have been propounded, who propounded each request and on what date, (2) What responses were made, who made each response and on what date, (3) The volume of documents produced, who produced the documents and when;

Pursuant to the Court’s December 1, 2022 Order (ECF No. 19, Dec. 1, 2022), the Parties have produced the documents in their possession relating to the family court proceeding in Japan. On December 16, 2022, Petitioner produced 12 documents, each ranging from 2 to 20 pages in length. On December 3, 2022 and December 14, 2022, Respondent produced documents to Petitioner. Respondent produced a total of 28 documents, each ranging from 1 to 34 pages in length.

(b) The procedural history of the case to date, specifically (1) What pleadings have been filed, who filed each pleading and on what date, (2) What motions, if any, have been filed, who filed each motion and on what date each motion was filed, (3) What motions, if any, are currently pending and, for each pending motion, the date it was or is scheduled to be fully briefed; and

On September 20, 2022, Petitioner filed the Verified Petition for Return of KLM and RHM Pursuant to the Hague Convention on the Civil Aspects of International Child Abduction (ECF No. 1, Sept. 20, 2022);

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On September 29, 2022, Petitioner filed an Amended Verified Petition for Return of KLM and RHM Pursuant to the Hague Convention on the Civils Aspects of International Child Abduction (ECF No. 5, Sept. 29, 2022);

On October 25, 2022, the Parties filed a Notice of Joint Agreement and Request for Extension of Time for Respondent's Answer to the Amended Verified Petition for Return of KLM and RHM Pursuant to Hague Convention (ECF No. 11, Oct. 25, 2022);

On November 8, 2022, Respondent filed her Answer to Petitioner's Amended Verified Petition (ECF No. 15, Nov. 8, 2022);

On November 23, 2022, the Parties filed a Joint Letter to the Court, including the Proposed Civil Case Management Plan and Scheduling Order (ECF No. 18, Nov. 23, 2022);

On December 22, 2022 the Parties filed a Joint Request to Reset Mediation Date (ECF No. 23, Dec. 22, 2022). The first date of mediation shall take place on January 13, 2023.

There are no pending motions.

(c) The parties' plans to ensure that they meet the Court ordered discovery deadlines.

The Parties met the Court's December 16, 2022 deadline to produce documents related to the Japanese family court proceeding. The Parties believe they are on track to meet the Court's January 13, 2023 fact discovery deadline.

The Parties appreciate Your Honor's attention to this matter.

Respectfully submitted,

Arnold & Porter

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